

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

CAMERON SHEA and  
KALEB COLE,

Defendants.

NO. CR20-032JCC

MOTION FOR PROTECTIVE ORDER  
REGARDING DISCOVERY MATERIALS

The United States moves pursuant to Rule 16(d)(1) for a protective order restricting the dissemination of discovery in this matter that references any confidential sources, undercover agents, or the identities of any law enforcement agents.

On March 4, 2020, a grand jury returned an indictment charging Cameron Shea, Kaleb Cole, and two others with conspiracy and mailing threatening communications. The indictment alleges a plot to intimidate journalists and others. As of the date of this filing, only Shea and Cole have made their appearances in this District. In light of the nature of the allegations, the government believes that a protective order is appropriate to cover the material referenced above.

Accordingly, the government proposes the attached protective order which, to the extent the materials reference any confidential sources, undercover agents, or the

1 identities of any law enforcement agents (1) grants Shea, Cole, and their attorneys access  
2 to all of the discovery materials; (2) restricts the dissemination of the materials outside  
3 the defense team; and (3) requires that the materials remain in the possession of Shea and  
4 Cole's attorneys and their staff, as well as any experts who are retained in this matter.

5 The government conferred with counsel for Shea and Cole, and they do not oppose  
6 the relief sought in this motion.

7 DATED: March 23, 2020

8 Respectfully submitted,

9 BRIAN T. MORAN  
10 United States Attorney

11 /s/ Thomas M. Woods

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Western District of Washington and is a person of such age and discretion as to be competent to serve papers;

It is further certified that on March 23, 2020, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants.

/s/ Salee Porter  
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